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April 6, 2025

VIA ECF

The Honorable Sidney H. Stein  
United States District Judge  
United States District Court for the  
Southern District of New York  
500 Pearl Street  
New York, NY 10007

Re: United States v. Nadine Menendez, (S4) 23-cr-490 (SHS)

Dear Judge Stein:

Apologies to Your Honor for the weekend interruption. From my point of view at least, there is no need for the Court to review this submission until the coming working week commences. Since our colloquy with the Court last week concerning our proffers of anticipated testimony of defense witnesses, Ms. Schwietz and I have been working, we hope, to ensure that our proffers achieve a sufficient level of comprehensiveness and specificity. We append here, as exhibits to this letter, supplemental proffers concerning defense witnesses. These exhibits are:

Exhibit 1: A consolidated supplemental proffer.

Exhibits 2 and 2A: Updated proffer concerning Michael Critchley

Exhibit 3: Additional proffers concerning several prospective defense witnesses

Exhibit 4: Additional proffer concerning Nicholas Lewin

Exhibit 5: Additional proffers concerning several prospective defense witnesses

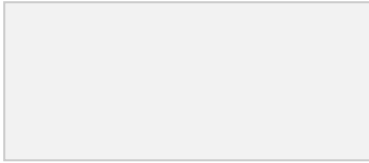
Exhibit 6: Responses to series of questions from the government about the defense case

Exhibit 7: Additional proffer concerning Mr. Hana

Exhibit 8: Second iteration of our earlier proffers

In addition, yesterday (Saturday, April 5, 2025) we received a series of emails from the government about the defense case. We have consolidated them into Exhibit 9, including our responses to them, which, as previously, we have interlineated into the body of the government's emails, using all capital letters so the responses are easy to identify and pair with the questions to which they respond. We may supplement these responses during the course of the day today (Sunday, April 6, 2025).

Respectfully submitted,



Barry Coburn